

Policy Name:	<b>Complaints Policy</b>
Policy Number & Version:	<b>4.5</b>
Written By:	<b>N/A</b>
Date First Approved:	<b>March 2012</b>
Last Amended By:	<b>MSI Asia Pacific</b>
Date Amendment Approved:	<b>Mar 2025</b>
Last Approved By:	<b>MSIAP Board</b>
Date of Next Review:	<b>Mar 2028</b>
Policy Owner:	<b>Executive Officer</b>

## **Table of Contents**

1.0	Background .....	2
2.0	Principles .....	3
3.0	Objectives .....	2
4.0	Definitions .....	2
5.0	Policy .....	3
6.0	Procedures .....	5
6.1	<i>How complaints may be made</i> .....	5
6.2	<i>How complaints will be handled</i> .....	6
6.3	<i>Initial assessment</i> .....	7
6.4	<i>How complaints will be investigated</i> .....	7
6.5	<i>Outcomes</i> .....	8
6.7	<i>Timeframes</i> .....	8
6.8	<i>Complaint data and confidentiality</i> .....	8
6.9	<i>Reporting about complaints</i> .....	8
6.10	<i>Continuous improvement and learning in complaint handling</i> .....	9
7.0	Related Policies, Codes and Obligations .....	9

## 1. Background

MSI Asia Pacific (“**MSIAP**”) and its partners, are specialist sexual and reproductive health, non-governmental organisations (NGO) working in Asia and the Pacific to improve the sexual and reproductive health (SRH) of all people.

Our mission is **children by choice, not chance**.

MSIAP recognises the importance and value of listening and responding to concerns and complaints, particularly feedback from our clients. We are committed to achieving the highest standard of service in every area of our work. We also believe strongly in continuous improvement. We recognise receiving concerns and complaints as well as responding to them is an important mechanism of learning. This policy defines our commitment to accountability and managing complaints related to our work.

This policy should be read in conjunction with the [MSIAP Speaking Up Policy](#), [MSIAP Child Safeguarding Policy](#) and [MSIAP Adult Safeguarding and PSEAH Policy](#)

## 2. Objectives

The objective of this policy is to establish a set of internal standards, measures and practices to ensure that stakeholders are able to hold MSIAP, and its partners to account for its actions or decisions by providing a process where these can be queried and adequately responded to in an appropriate, effective and timely manner.

## 3. Definitions

<b>Accountability</b>	processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against this commitment
<b>Complainant</b>	a person, groups of people, organisation or its representative making a complaint.
<b>Complaint</b>	a statement or expression of dissatisfaction in relation to MSIAP’s activities and services in the Asia Pacific region or concerns about the behaviour of MSI staff, volunteers or contractors, including theft or fraud, or abuse of power. A complaint has to be about an action for which MSIAP is responsible or is within our sphere of influence. A complaint does not include a partner’s or client’s disagreement with our policy. Moreover, a complaint is not a contractual dispute.
<b>Feedback</b>	Stakeholder opinions / comments and or suggestions in relation to MSIAP’s activities within the Asia Pacific region.
<b>Partners</b>	MSI Asia Pacific defines partners as stakeholders that collaborate with MSIAP to achieve mutually agreed objectives in service provision, development activities, advocacy and fundraising. These include but are not restricted to: Country Programs of MSI Reproductive Choices globally, consortium and alliance partners and downstream implementing partners which are predominantly local CSOs whom MSI partners with

	that have been subcontracted by Country Programs to implement project activities.
<b>Stakeholder</b>	a person or group affected by or holding an interest in MSIAP's operations (such as employees, donor, client, beneficiary of our services, local communities)

#### **4. Principles**

MSIAP and its partners are not-for-profit NGOs, with no political or religious affiliations. We work for the improvement of the health and quality of life of all people, helping them to exercise their right to enjoy reproductive health, and have children by choice, not by chance. MSIAP and its partners are committed to saving lives through sexual and reproductive health care and do this through:

- Providing quality, confidential, client-centred sexual and reproductive health care including family planning services
- Sustainable service provision
- Advocacy

#### **The Right to Redress**

- i. The 'right to redress' and to have a complaint heard and acted upon is an important part of an accountability framework and a mechanism through which MSIAP can be held accountable to our stakeholders; clients, staff, volunteers, donors and partners.

#### **Continuous Improvement**

- ii. We are committed to achieving the highest standards in operations and activities and to continuous improvement. We value listening and responding to concerns and complaints as an important way of learning to improve our operations and projects.

#### **Non-discrimination and Objectivity**

- iii. We will address all complaints in an equitable, fair, and unbiased manner seeking evidence from both the complainants and our personnel during the complaint handling process.

#### **Accountability**

- iv. We will ensure that accountability for, and reporting on, actions and decisions in relation to complaint handling are transparent, clearly established and understood.

#### **Confidentiality**

- v. All matters raised and dealt with under the complaints handling system will respect the privacy of the complainant and be dealt with in ways that put the best interests of the complainant first (information will only be shared on a *need-to-know* basis). All complainants have the right to request that they be deidentified in all internal and external correspondence.

#### **Accessibility**

- vi. We will ensure that partners and clients, including children, have accessible, safe and discrete points of contact through which to raise concerns or

complaints. Refer to [MSI's Speaking Up Policy](#) for access to confidential reporting channels.

### **Client-centred approach**

- vii. In accordance with our organisational commitment to our clients we will ensure the interests of our clients are at the centre in our approach to complaint handling.

### **Survivor-centred approach**

- viii. MSIAP is committed to providing appropriate assistance and referrals to survivors to access support services.

### **No reprisals**

- ix. MSIAP will not tolerate any harassment or victimisation of, or other form of reprisal (including informal pressure) against, any individuals who raise concerns in good faith, and will take appropriate action to protect such individuals. Any harassment, victimisation or other form of reprisal by MSIAP personnel will be treated as a serious disciplinary offence and may result in dismissal.

## **5. Policy**

### **5.1. MSIAP, and partners will:**

- Recognise the importance and value of listening and responding to concerns and complaints.
- Advise a complainant of the ability to make a complaint regarding an alleged breach of the ACFID Code of Conduct directly to the ACFID Code of Conduct Committee - <http://www.acfid.asn.au/code-of-conduct/complaints>
- Ensure that stakeholders are made aware of the ability to lodge a complaint regarding an alleged breach of the ACFID Code of Conduct to the ACFID Code of Conduct Committee.
- Ensure MSIAP activities in the Asia Pacific region are fair, equitable, safe, confidential and accessible to all stakeholders, irrespective of their gender, status, ethnicity, age or background and without prejudice to their future participation.
- Ensure that our feedback and complaints handling processes are outlined on our website including our complaint process, point of contact, and contact details for complaints.
- Have nominated points of contact in Australia and overseas to handle complaints relating to any aspect of MSIAP's management, procedures or work practices.
- Equip staff and volunteers with an understanding of our approach to handling complaints and information about appropriate procedures to effectively implement this policy.
- MSIAP complaint points of contact are:
- MSIAP Executive Officer for complaints raised in Australia; and

## 5.2. Working with Partners

In the countries where we work, complaints can be made to MSI personnel in-country (Country Program personnel), verbally, through email or via the Safecall portal.

MSIAP works with partners and personnel in-country to ensure:

- Downstream Implementing partners in-country (local CSO's) understand MSI's Complaint Handling mechanisms, procedures and processes
- Due diligence checks are conducted to ensure downstream implementing partners have adequate complaint handling processes in place organisationally
- Complaints are handled (where relevant) in line with MSI's requirements
- Complaints are recorded and reported, where required, to MSI
- Where support is requested, MSI will consider and may work with downstream implementing partner organisations to support the development and implementation of complaint investigation processes.

Receiving complaints and feedback from project participants and stakeholders is important to MSI. It forms part of the monitoring and evaluation of our programs and projects. MSI will continue to work with our partners to strengthen their own feedback and complaints mechanisms where relevant.

## 6. Procedures

### 6.1. How complaints may be made

Clients/stakeholders are able to provide feedback or make a complaint in Australia via telephone, social media, email, or by post. The MSIAP contact details and the complaints handling process are outlined on the '[Contact Us](#)' page on the MSIAP website.

Clients/stakeholders are able to feedback or make a complaint in-country in person and via the telephone, social media, email, or in writing. The contact details for country programs are outlined on the MSI Reproductive Choices website and relevant country program website pages.

Additionally, there is an external, confidential, accessible speaking up service which is independent of MSIAP. The speaking up service can be accessed by:

**Phone:**

- Australia: 1800 312 928

**Webmail:** [www.safecall.co.uk/report](http://www.safecall.co.uk/report); or

**Email:** [speakingup@safecall.co.uk](mailto:speakingup@safecall.co.uk).

In our clinics / locations where MSI services are provided, clients are provided with feedback forms. Client exit interviews are used in many countries for the purpose of gaining additional information regarding the service, needs and experiences of clients so we can better improve our services and activities, in order to respond to our client's needs.

MSI has an extensive and high standard practice in place for investigating and reporting on serious adverse clinical outcomes resulting in major complication or death.

Any complaints that MSIAP receives, but that do not fall within the scope of this policy, (i.e. complaints that cannot be investigated by MSIAP, such as complaints against

another organisation or Government department), with the consent of the complainant, the complaint will be referred to the appropriate organisation for their attention.

### 6.2. How complaints will be handled

If the complaint is made by telephone or in person, the team member must:

- Listen and show understanding.
- Not become defensive, blame someone else or jump to conclusions.
- Respect the complainants wishes.

If the complaint is made by email or letter:

- Ring or email the complainant to confirm the complaint has been received, get further information if required and confirm when the MSIAP representative will get back to them.

In other circumstances, we will:

- Seek to understand from the client / stakeholder the outcomes they are expecting.
- Offer the complainant access to support services where appropriate. This may include, but is not restricted to medical, social, legal and financial assistance, or referrals to such services. Our overriding concern is always for the safety, wellbeing, dignity and best interests of a victim/ survivor.
- Make an initial assessment of the severity of the complaint and the urgency of the action.
- Clearly explain to the client / stakeholder the actions that will follow:
  - If the complaint is out of our jurisdiction.
  - If we may exercise a discretion not to investigate.
  - If preliminary enquires need to be made or further consideration needs to be given, or
  - If the complaint is to be investigated.
- We will not create false expectations but assure the client / stakeholder it will receive full attention.
- Give an estimated timeframe or if that is not possible, a date by which we will contact them again.
- Follow up where necessary and monitor whether the client / stakeholder is satisfied.
- We will register all complaints. The register will be shared with the MSIAP board during their board meetings.
- Where appropriate we will ensure that personnel working in our programs, and clinics have all necessary training to encourage and handle inquiries and making of complaints and to ensure that cases involving children are appropriately handled.
- We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person

implicated in a complaint is not involved in any way with the handling of that complaint.

If the complaint is made anonymously:

- This Policy encourages you to put your name to the concerns you raise wherever possible. If you do not tell us who you are, it will be much more difficult for us to protect you or give you feedback. However, complaints that are raised anonymously will not be ignored. We will identify:
  - If the complaint is within our jurisdiction and refer it to the appropriate organisation if it is not.
  - Make an initial assessment of the severity of the complaint and the urgency of the action.
  - If preliminary enquiries need to be made prior to investigating the complaint.
  - If the complaint is to be investigated.

### 6.3. Initial assessment

MSIAP considers the following issues constitute serious complaints (note that this is not an exhaustive list):

- Exploitation or abuse of children, vulnerable adults or any other person.
- Misuse of funds or fraud (including terror financing).
- Misconduct (including sexual exploitation, abuse, and harassment).
- Concern from someone with whom we work about the quality of program delivery.
- Concern from a member of the public or supporter about a particular fundraising approach or campaign.

All serious complaints will be elevated to the relevant members of the MSIAP Senior Management Team (SMT) and the Executive Officer (EO).

In cases where it is determined that a complaint will not be investigated, (for example, because there is insufficient evidence to substantiate the complaint, the complaint has been made in bad faith/ it is vexatious, or it is deemed a human resources issue) we will inform the complainant of this, and as far as possible, will ensure that the complainant is satisfied with the information and/or resolution provided.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague to review. If such a dispute cannot be resolved, we will refer the complaint to the ACFID Code Committee.

### 6.4. How complaints will be investigated

MSIAP will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness of the complaint.

Where appropriate, general complaints are referred to the local level to be investigated and resolved. Where this is not possible (because the complaint is sensitive, because there isn't enough capacity or expertise at the local level, or because the allegation



involves senior personnel), the matter will be referred to a more senior person in the organisation.

Sensitive complaints (including fraud, sexual exploitation, abuse and harassment and child safeguarding matters) are always referred to an internal Decision Committee consisting of senior MSI personnel. If the complaint involves children, comes from a child, or relates to adult safeguarding the MSIAP Senior Technical Specialist (Programming Partnerships & Safeguarding) will be advised, and the MSIAP Safeguarding Incident Reporting Guidelines outlined in the MSIAP Child Safeguarding and MSIAP Adult Safeguarding and Preventing Sexual Exploitation Abuse and Harassment Policies will be followed. Please refer to the aforementioned policies to review MSIAP's survivor-centred approach to respond to safeguarding incidents and complaints.

Complaints will be assigned to an appropriate person who is impartial and has the authority to take action where necessary. For example, where a complaint involves the Executive Officer, it will be directed to the Chair of the Board.

A confidential complaints register containing all complaints and subsequent actions will be kept by the MSI Asia Pacific Executive Officer and Country Directors. Upon request, complainants can have their information de-identified within the register.

### 6.5. Outcomes

MSIAP will take all required remedial action. Where appropriate we will consult and take advice from ACFID and/or other relevant regulatory and enforcement authorities.

MSIAP will strive to learn from any complaints made and will ensure that all relevant personnel are informed of the outcomes of the complaints and implications for our services, activities and procedures.

### 6.6. Timeframes

We will aim to respond to complaints as quickly as possible. Complaints will be acknowledged within 7 working days. For complaints or incidents relating to safeguarding, refer to the [MSIAP Safeguarding & PSEAH Reporting Procedure](#), which detail immediate reporting obligations. We will aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

### 6.7. Complaint data and confidentiality

All matters raised and dealt with under the complaints handling system will respect the privacy of the complainant and be dealt with in ways that put the best interests of the complainant first (information will only be shared on a *need-to-know* basis).

MSIAP will not reveal a complainant's name or personal details to anyone in or outside our organisation without the documented, informed consent of the individual.

### 6.8. Reporting about complaints

All complaints and responses will be reported to the Board at each MSIAP Board Meeting.



#### **6.9. Continuous improvement and learning in complaint handling**

MSIAP will monitor the effectiveness of our complaint handling and make improvements as appropriate.

### **7. Related Policies, Procedures, Codes and Obligations**

- [MSIAP Child Safeguarding Policy](#)
- [MSIAP Child Safeguarding Code of Conduct](#)
- [MSIAP Adult Safeguarding and PSEAH Policy](#)
- [MSIAP Safeguarding & PSEAH Reporting Procedure](#)
- [MSI Speaking Up Policy](#)
- [MSI Code of Conduct](#)
- [MSIAP Anti-Fraud & Bribery Policy](#)